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FILE NO. 082-35033

September 11, 2007

VIA AIR MAIL

Office of International Corporate Finance Division of Corporation Finance Securities and Exchange Commission 450 Fifth Street, N.W. Washington, D.C. 20549 U.S.A.

Idemitsu Kosan Co., Ltd. Rule 12g3-2(b) Exemption

Dear Sirs:

Pursuant to Rule 12g3-2(b) under the Securities Exchange Act of 1934, we, as legal counsels to Idemitsu Kosan Co., Ltd. (the "Company") with respect to its international offering of common stock, enclose herewith English translation of the document which contents were announced by the Company:

Consolidated Financial Results for the First Quarter of Fiscal Year 2007 (From April 1, 2007 to June 30, 2007) (dated August 1, 2007) (Excerpt translation)

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OCT 2 3 2007 E

THOMSON FINANCIAL

Yours truly,

Kaoruko Suzuki

Encl

cc:

Idemitsu Kosan Co., Ltd.

Baker & McKenzie GJBJ Tokyo Aoyama Aoki Koma Law Office (Gaikokuho Joint Enterprise) is a member of Baker & McKenzie International, a Swiss Verein.

Consolidated Financial Results for the First Quarter of Fiscal Year 2007 (From April 1, 2007 to June 30, 2007)

Company Name: Idemitsu Kosan Co., Ltd. (URL http://www.idemitsu.co.jp/)

Company Code: 5019, Shares listed on: TSE, First Sect. Name of Representative: Akihiko Tembo, President

Contact person: Takayuki Endo, General Manager of IR Office.

Telephone: +81-3-3213-9307

1. Consolidated Financial Results for the First Quarter of FY2007 (From April 1, 2007 to June 30, 2007)

Note: Figures less than ¥1 million are rounded off

(1) Consolidated operating results

| | Net sales | | Operating income | | Ordinary Inco | me | Net income | |
|-----------|-----------|------|------------------|-------|---------------|-------|------------|-------|
| | ¥million | % | ¥million | % | ¥million | % | ¥million | % |
| 1Q FY2007 | 787,750 | △0.7 | 8,883 | △62.5 | 13,156 | △48.9 | 2,065 | △74.1 |
| 1Q FY2006 | 793,087 | 15.0 | 23,680 | 111.9 | 25,762 | 143.2 | 7,985 | 10.0 |
| FY2006 | 3,394,738 | _ | 102,813 | | 107,536 | | 41,591 | _ |

| | Net income per share | Net income per share, diluted |
|-----------|----------------------|-------------------------------|
| | ¥ | ¥ |
| 1Q FY2007 | 51.64 | _ |
| 1Q FY2006 | 292.28 | _ |
| FY2006 | 1,268.61 | _ |

(2) Consolidated financial position

| | Total assets | Net assets | Shareholders' equity ratio | Net assets per share | |
|-----------|--------------|------------|----------------------------|----------------------|--|
| | ¥million | ¥million | % | ¥ | |
| 1Q FY2007 | 2,371,742 | 563,805 | 22.5 | 13,337.30 | |
| 1Q FY2006 | 2,236,183 | 406,742 | 16.9 | 13,803.70 | |
| FY2006 | 2,333,129 | 561,376 | 22.8 | 13,322.56 | |

(3) Consolidated Cash Flows

| | Cash flows from operating activities | Cash flows from investing activities | Cash flows from financing activities | Cash and cash equivalents at end of the period | |
|-----------|--------------------------------------|--------------------------------------|--------------------------------------|--|--|
| | ¥million | ¥million | ¥million | ¥million | |
| 1Q FY2007 | 46 | △16,261 | 1,417 | 109,200 | |
| 1Q FY2006 | 42,902 | △3,690 | △18,069 | 154,571 | |
| FY2006 | 86,322 | △63,094 | △37,252 | 122,564 | |

2. Dividends

| | Cash Dividend per |
|-----------|-------------------|
| | share |
| | First Quarter |
| | ¥ |
| 1Q FY2007 | - |
| 1Q FY2006 | _ |

3. Consolidated business forecasts for FY2007 (From April 1, 2007to March 31, 2008)

| | Net sa | les | Operating | income | Ordinary income | | dinary income Net income | | Net income per share |
|----------------|-----------|-----|-----------|--------|-----------------|-------|--------------------------|-------|----------------------|
| | ¥million | % | ¥million | % | ¥million | % | ¥million | % | ¥ |
| Interim period | 1,730,000 | 4.6 | 27,000 | △33.3 | 29,000 | △29.7 | 7,500 | △27.4 | 187.54 |
| FY2007 | 3,670,000 | 8.1 | 87,000 | △15.4 | 86,000 | △20.0 | 29,000 | △30.3 | 725.18 |

Note: Percentage figures represent changes from the corresponding previous periods respectively

4.Others

- (1) Changes of number of material subsidiaries during the first quarter: None
- (2) Changes in accounting methods from the latest accounting period: Yes

 Depreciation method has been changed in accordance with revision of Income tax law.
- (3) Adoption of simplified accounting methods: None

[Note]

1.Non-consolidated Financial Results for the First Quarter of FY2007 (From April 1, 2007 to June 30, 2007)

(1) Operating results

| | Net sales | | Operating income | | Ordinary Income | | Net income | |
|-----------|-----------|------|------------------|------|-----------------|-------|------------|-------|
| | ¥million | % | ¥million | % | ¥million | % | ¥million | % |
| 1Q FY2007 | 735,107 | 0.7 | △2,421 | - | 4,005 | △61.9 | 2,240 | △47.9 |
| 1Q FY2006 | 729,700 | 21.2 | 10,185 | 41.6 | 10,525 | △31.4 | 4,303 | △79.5 |
| FY2006 | 3,107,842 | - | 58,327 | - | 53,981 | - | 22,811 | |

| | Net income per share | Net income per share, diluted |
|-----------|----------------------|----------------------------------|
| | ¥ | ¥ |
| 1Q FY2007 | 56.02 | - |
| 1Q FY2006 | 157.51 | _ |
| FY2006 | 695.80 | _ |

(2) Financial position

| | Total assets | Net assets | Shareholders' equity ratio | Net assets per share |
|-----------|--------------|------------|----------------------------|----------------------|
| | ¥million | ¥million | % | ¥ |
| 1Q FY2007 | 2,141,550 | 452,059 | 21.1 | 11,304.31 |
| IQ FY2006 | 2,027,884 | 320,484 | 15.8 | 11,730.11 |
| FY2006 | 2,110,475 | 452,423 | 21.4 | 11,313.05 |

2. Non-consolidated business forecasts for FY2007 (From April 1, 2007 to March 31, 2008)

| ü | Net sal | es | Operating | income | Ordinary i | income | Net in | come | Net income per share |
|----------------|-----------|-----|-----------|--------|------------|--------|----------|-------|----------------------|
| | ¥million | % | ¥million | % | ¥million | % | ¥million | % | ¥ |
| Interim period | 1,600,000 | 5.1 | 12,000 | △21.4 | 15,000 | 15.7 | 6,000 | 254.5 | 150.04 |
| FY2007 | 3,400,000 | 9.4 | 42,500 | △27.1 | 39,000 | △27.8 | 17,500 | △23.3 | 437.61 |

Note: Percentage figures represent changes from the corresponding previous periods respectively

* The business forecasts in the above are based on information available as of the date of publication of this document. Actual operating results may differ from the forecasts due to various factors.

Total liabilities

Consolidated Financial Statements for the First Quarter of FY2007

(1) Consolidated Balance Sheets

(Unit: ¥Million) FY2006 1Q FY2006 1Q FY2007 (Ended March 31, (Ended June 30, Change (Ended June 30, Item 2007) 2006) 2007) (Assets) 1,013,910 1.048.386 34,475 946.029 Current assets 109,200 Cash in hand and deposits at bank 107,580 1,619 144,571 Notes and accounts receivable-trade 413,738 461,841 48,102 304,418 9,999 Securities 14,983 $\triangle 14,983$ Inventories 333,707 343,462 335,582 △1,874 Others 142,026 143,636 1,610 143,577 1,323,356 1,290,154 Fixed assets 1.319.218 4.138 Tangible fixed assets 1,043,697 1,042,981 1,024,984 △715 Intangible fixed assets 34,931 34,690 32,217 △241 Investment and other assets 240,589 245,684 5,094 232,952 Total assets 2,371,742 2,236,183 2,333,129 38,613 (Liabilities) 1,071,317 1,012,327 Current liabilities 1,027,767 43,549 Notes and accounts payable-trade 301,988 335,651 33,663 278,464 Short-term borrowings 329,813 347,544 17,731 399,053 Current portion of Bonds 12,500 12,500 Accounts payable-other 291,621 289,267 $\triangle 2,354$ 236,796 Others 91,844 86,354 $\triangle 5,490$ 98,012 Long-term liabilities 743,984 736,620 △7,364 817,114 **Bonds** 73,000 73,000 85,500 418,982 Long-term debt 411,508 △7,473 488,187 Accrued retirement benefits to 58,715 56,190 △2,524 63,604 employees Others 193,286 195,920 2,633 179,822

| Item | FY2006 (Ended March 31, 2007) | 1Q FY2007 (Ended June 30, 2007) | Change | 1Q FY2006 (Ended June 30, 2006) |
|---|-------------------------------------|---------------------------------------|--------|---------------------------------------|
| (Net assets) | | · | | |
| Shareholders' equity | 365,025 | 361.308 | △3,717 | 216.443 |
| Common stock | 108,606 | 108,606 | | 51,388 |
| Additional paid-in capital | 71,140 | 71,141 | o | 12,535 |
| Retained earnings | 185,379 | 181,680 | △3,698 | · · |
| Treasury stocks | △101 | △120 | △18 | · · |
| Valuation and translation adjustments Unrealized holding gains on | 167,761 | <u>172,050</u> | 4.289 | <u> 160,694</u> |
| investment in securities | 15,180 | 14,923 | △256 | 12,875 |
| Deferred gains on hedges | 3,949 | 7,591 | 3,642 | 5,871 |
| Revaluation reserve for land | 146,734 | 146,499 | △234 | 146,220 |
| Translation adjustments | 1,896 | 3,035 | 1,139 | △4,272 |
| Minority Interests | 28.590 | 30,446 | 1.855 | |
| Total net assets | 561,376 | | | |
| Total liabilities and net assets | 2,333,129 | 2,371,742 | 38,613 | 2,236,183 |

1,771,752

1,807,937

36,185

1,829,441

(2) Consolidated Statements of Income

| (2) Consolidated Statements of | | | | (Unit: ¥Million |
|---|--|--|---------|---|
| Item | 1Q FY2006 (From April 1, 2006 to June 30, 2006) | 1Q FY2007 (From April 1, 2007 to June 30, 2007) | Change | FY2006 (From April 1, 2006 to March 31, 2007) |
| Net sales | 793,087 | 787,750 | △5,336 | 3,394,738 |
| Cost of sales | 714,940 | 723,470 | 8,530 | 3,061,781 |
| Gross profit Selling, general and administrative | 78,147 | 64,280 | △13,867 | 332,957 |
| expenses | 54,466 | 55,396 | 929 | 230,144 |
| Operating income | 23,680 | 8,883 | △14,796 | 102,813 |
| Non-operating income | 6,943 | 9,085 | 2,142 | 28,491 |
| Interest and dividend income | 3,585 | 4,274 | 688 | 8,091 |
| Gain (loss) on foreign exchange, net Equity in earnings of non-consolidated | 1,107 | · | 567 | , i |
| subsidiaries and affiliates, net | 1,786 | 2,050 | 264 | 1 |
| Others | 464 | 1,086 | 621 | 3,715 |
| Non-operating expenses | 4,861 | 4,812 | △48 | _, |
| Interest expenses | 4,276 | , | △131 | 1 |
| Others | 585 | 668 | 83 | 6,368 |
| Ordinary income | 25,762 | 13,156 | △12,605 | 107,536 |
| Extraordinary gains | 597 | 661 | 63 | 7,656 |
| Gains on the sale of fixed assets | 137 | 323 | 185 | 5,250 |
| Others | 460 | 338 | △122 | 2,405 |
| Extraordinary losses | 3,448 | 1,233 | △2,215 | 16,390 |
| Impairment loss on fixed assets Loss on disposal of tangible fixed | 2,612 | - | △2,612 | 8,648 |
| assets | 614 | 977 | 363 | 5,360 |
| Others | 222 | 255 | 33 | 2,382 |
| Income before income taxes | 22,911 | 12,585 | △10,326 | 98,802 |
| Income taxes | 13,573 | 9,285 | △4,288 | 54,136 |
| Minority interests | 1,351 | 1,234 | △116 | 3,074 |
| Net income | 7,985 | 2,065 | △5,920 | 41,591 |

(3) Consolidated Statements of Cash Flows

(Unit: ¥Million)

| (Unit: ¥Millie | | | | | | | | |
|--|------------------------|------------------------|------------------------|--|--|--|--|--|
| | 1Q FY2006 | 1Q FY2007 | FY2006 | | | | | |
| Item | (From April 1, 2006 to | (From April 1, 2007 to | (From April 1, 2006 to | | | | | |
| | June 30, 2006) | | March 31, 2007) | | | | | |
| Cash flows from operating activities | | | | | | | | |
| Income before income taxes and minority | 22.21 | ` 10.505 | 00.000 | | | | | |
| interests Depreciation and amortization | 22,911 | | | | | | | |
| , · | 13,303 | | | | | | | |
| Impairment loss on fixed assets | 2,612 | " | 8,648 | | | | | |
| Increase(△decrease)in accrued retirement benefits to employees (△Increase) decrease in notes and | △546 | △2,524 | △5,454 | | | | | |
| accounts receivable, trade | 28,067 | △47,865 | △79,719 | | | | | |
| (\(\triangle\) Increase) decrease in inventories | △24,649 | | | | | | | |
| Increase (△decrease) in notes and | △24,049 | 1,772 | 415,791 | | | | | |
| accounts payable-trade Increase (\(\triangle\) decrease) in accounts payable, | △6,770 | 33,583 | | | | | | |
| other | △5,451 | 2,051 | 39,742 | | | | | |
| Payment of income taxes | △10,741 | △13,373 | △50,322 | | | | | |
| Others | 24,167 | △3,507 | 15,615 | | | | | |
| Net cash provided by operating activities | 42,902 | | | | | | | |
| Cash flows from investing activities | | | | | | | | |
| Purchases of tangible fixed assets | △12,521 | △19,239 | △67,287 | | | | | |
| Proceeds from sale of tangible fixed assets | 833 | 834 | 7,867 | | | | | |
| Purchases of investment securities | ∆199 | | 1 | | | | | |
| Proceeds from sale of investment securities | | 29 | · | | | | | |
| Others | 8,197 | | | | | | | |
| Net cash used in investing activities | ∆3,690 | | △63,094 | | | | | |
| Cash flows from financing activities | 23,090 | △ 10,201 | | | | | | |
| Increase (\(\triangle \text{decrease} \) in short-term | | | | | | | | |
| borrowings, net | 9,756 | 20,718 | △31,874 | | | | | |
| Proceeds from long-term debt | _ | 1,381 | 55,321 | | | | | |
| Repayment of long-term debt | △22,169 | 1 | | | | | | |
| Proceeds from issuance of common stock | | , | 113,563 | | | | | |
| Others | △5,656 | △8,396 | · · · | | | | | |
| Net cash used in financing activities | △18,069 | | | | | | | |
| Effect of exchange rate changes on cash and | 210,000 | 1,71/ | | | | | | |
| cash equivalents | 1,079 | 1,433 | 4,238 | | | | | |
| Net increase(△decrease) in cash and cash | 22,221 | △13,363 | △9,785 | | | | | |
| equivalents Cash and cash equivalents at beginning of the | | △ 13,303 | | | | | | |
| period | 132,747 | 122,564 | 132,747 | | | | | |
| Net (△decrease) in cash and cash equivalents | | | | | | | | |
| resulted from change in scope of consolidation | | | △397 | | | | | |
| Cash and cash equivalents at end of the period | 154,571 | 109,200 | 122,564 | | | | | |

(4)Consolidated Segment Information

[Business segment information]

(1) For the First Quarter of FY2006 (From April 1, 2006 to June 30, 2006)

(Unit: ¥Million)

| | Petroleum products | Petrochemical products | Oil exploration and production | Others | Total | Elimination and corporate | Consolidated |
|------------------------------------|-----------------------|------------------------|---|--------|---------|---------------------------|--------------|
| Net sales | | | | | | | |
| (1) Net sales to outside customers | 590,917 | 147,999 | 23,491 | 30,678 | 793,087 | - | 793,087 |
| (2) Inter-segment | 718 | 395 | | 1,802 | 2,916 | (2,916) | |
| Total | 591,635 | 148,395 | 23,491 | 32,481 | 796,003 | (2,916) | 793,087 |
| Operating expenses | 586,057 | 142,203 | 11,802 | 32,272 | 772,335 | (2,928) | 769,406 |
| Operating income | 5,578 | 6,191 | 11,689 | 209 | 23,668 | 12 | 23,680 |

(2) For the First Quarter of FY2007 (From April 1, 2007 to June 30, 2007)

(Unit: ¥Million)

| 18.6 | | | _ | | | (| 11.11111011) |
|--------------------------|-----------------------|------------------------|---|--------|---------|---------------------------------|--------------|
| | Petroleum products | Petrochemical products | Oil exploration and production | Others | Total | Elimination and corporate | Consolidated |
| Net sales | | | | | | | |
| (1) Net sales to outside | | | | | | | |
| customers | 570,283 | 167,684 | 21,719 | 28,062 | 787,750 | _ | 787,750 |
| (2) Inter-segment | 706 | 437 | - | 1,934 | 3,079 | (3,079) | |
| Total | 570,990 | 168,122 | 21,719 | 29,997 | 790,829 | (3,079) | 787,750 |
| Operating expenses | 576,149 | 163,836 | 10,943 | 31,008 | 781,937 | (3,070) | 778,866 |
| Operating income (loss) | △5,158 | 4,285 | 10,776 | △1,011 | 8,892 | (8) | 8,883 |

(3) For the FY2006 (From April 1, 2006 to March 31, 2007)

(Unit: ¥Million)

| Cont.: 4141111101 | | | | | | | 11.11111011 |
|------------------------------------|--------------------|------------------------|---|---------|-----------|---------------------------------|--------------|
| | Petroleum products | Petrochemical products | Oil exploration and production | Others | Total | Elimination and corporate | Consolidated |
| Net sales (1) Net sales to outside | | | | | | | |
| customers | 2,535,934 | 622,823 | 87,196 | 148,784 | 3,394,738 | - | 3,394,738 |
| (2) Inter-segment | 3,389 | 1,649 | - | 8,235 | 13,274 | (13,274) | _ |
| Total | 2,539,323 | 624,473 | 87,196 | 157,019 | 3,408,013 | (13,274) | 3,394,738 |
| Operating expenses | 2,521,582 | 580,200 | 50,341 | 153,131 | 3,305,256 | (13,331) | 3,291,925 |
| Operating income | 17,741 | 44,272 | 36,854 | 3,888 | 102,756 | 56 | 102,813 |

Notes:

- 1. The business segments are determined in accordance with the Company's internal business management policy.
- 2. Each business segment's major products or operations
 - (1)Petroleum products: Petroleum products including gasoline, naphtha, kerosene, diesel oil and heavy fuel oil, lubricants, LPG and marine transportation
 - (2) Petrochemical products: Petrochemicals including ethylene
 - (3)Oil exploration and production: Investigation, exploration, development and sales of oil resources
 - (4)Others: Coal mining, sales of automobile-related goods, leasing, electronic materials business and construction and maintenance business

